

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

KAREN COCHENOUR, individually and on)	
behalf of others similarly situated,)	
)	
Plaintiff,)	
)	Civil Action No. 1:25-CV-00007-RP
v.)	
)	
360TRAINING.COM, INC., D/B/A)	
MORTGAGE EDUCATORS AND)	
COMPLIANCE, INC.,)	
)	
Defendant.)	

NOTICE OF CONSTITUTIONAL QUESTION

To: Pamela Bondi
Attorney General for the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

PLEASE TAKE NOTICE, pursuant to Fed. R. Civ. P. 5.1(a)(1)(A), that Defendant 360training.com, Inc., d/b/a Mortgage Educators and Compliance's Motion to Dismiss Plaintiff's Class Action Complaint questions the constitutionality of the federal Video Privacy Protection Act, 18 U.S.C. § 2710. Specifically, Defendant argues that the VPPA is an unconstitutional restraint on speech in violation of the First Amendment of the United States Constitution. A copy of Defendant's Motion to Dismiss and this Notice of Constitutional Question will be served upon the United States Attorney General.

Dated: March 5, 2025

Respectfully submitted,

/s/ Rachel Palmer Hooper

Rachel Palmer Hooper

Texas Bar No. 24039102

BAKER & HOSTETLER LLP

811 Main Street, Suite 1100

Houston, TX 77002

Telephone: 713.751-1600

Facsimile: 713-751-1717

rhooper@bakerlaw.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was electronically filed on March 5, 2025 with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record. I further certify that a true and correct copy of the foregoing document was served via certified mail on the following:

Pamela Bondi
Attorney General for the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

/s/ Rachel Palmer Hooper